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Sierra Club, IL Chapter

200 N. Michigan ave. Reform Agenda for the US Army Corp of Engineers

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I. Put the "Civil" back into Civil Works

The water resources of the region are the common wealth of all of us in the nation. We believe that how decisions are made about the use of this wealth would be more reflective of the broad interests of the nation if the Administration, Congress and the Corps took the following steps:

II. Increase Congressional and Civilian Control

Congress should require that projects whose total costs exceed \$25 million or that are controversial should be subject to an independent, outside peer review. The peer review team should include a balance of economists, engineers, and other environmental scientists and shall be designated for each project by the Office of the Assistant Secretary of the Army for Civil Works.

III. Expand the Mission of the Corp's Environmental Advisory Board

The Administration should expand the mission of the Corps' Environmental Advisory Board (EAB) to review proposed projects during the reconnaissance phase to determine whether the project's impacts can be cost-effectively and successfully mitigated. The review process should require that the U.S. Fish and Wildlife Service submit a report to the EAB with their assessment of the likelihood of successful and cost-effective mitigation.

IV. Increase Civilian Accountability in the Chain of Command

The Administration should take steps to assure that the Chief of Engineers be clearly answerable and accountable to the Assistant Secretary of the Army for Civil Works. Further, top civilian personnel in all Division and District offices should be directly responsible to the Assistant Secretary of the Army for Civil Works.

V. Make Environmental and Economic Values Co-Equal Goals in Principle and Practice

The Mississippi River is an internationally-significant ecological resource as well as an internationally significant economic resource. But the planning guidelines and cost-benefit ratios used to evaluate project benefits have unquestionably favored the economic values. We believe that a better balance of environmental and economic benefits can be attained if the Administration, Congress and the Corps would take the following steps:

VI. Revise The Principles and Guidelines

The Administration should require amendments to the current Principles and Guidelines to require that economic and environmental benefits are co-equal in water resource project planning and evaluation. For rivers, the amendments should include goals to preserve or restore or mimic the hydrologic processes, spatial extent and habitat and species diversity of aquatic ecosystems.

VII. De-Authorize Environmentally and Fiscally Wasteful Projects

The Corps of Engineers should review its \$27 billion backlog of projects that Congress directed it to complete, but have not been funded to date. Projects that are out of date, have significant environmental impacts or are economically wasteful should be recommended to the Administration for de-authorization. The Administration should establish a commission made up of environmental and economic interests to review the Corp's recommendations, identify projects with high environmental costs and low economic benefits, and report back to the Administration and Congress within one year after its establishment.

VIII. Cumulative Impacts of Existing Projects should be factored into decisions for ongoing maintenance or major rehabilitation

The Administration amend the Code of Federal Regulations to mandate that proposals for major rehabilitation and/or expansion of existing water resource projects be required to fully evaluate the cumulative impacts of the existing project since inception as well as the added cumulative impacts of major rehabilitation or expansion. Guidance for such action has already been prepared by the CEQ in its 1997 document, "Considering Cumulative Effects."

IX. Take A Leadership Role in Implementing Significant Improvements for Management of the Upper Mississippi River

In 1998 and 1999 several reports were completed which were consistent and complimentary in documenting the degradation of the Upper Mississippi River and proposing modifications in how we manage the river that can continue to be used for commercial navigation while its ecological health is restored.

The Corps of Engineer's 1998 "Report to Congress for the Environmental Management Program," the U.S. Geological Survey's 1998 "Status and Trends Report" and the Upper Mississippi River Conservation Committee's January, 2000 report entitled "A River That Works and A Working River" all provide information supporting the following recommendations (which also appear on page 38 of the latter document;)

X. Restore Habitat in the Floodplain

The Mississippi Valley Division of the Corps of Engineers should implement a program to restore natural habitat in the floodplain that has been segregated from the river channel by dikes and levees by acquiring fee title or easements on marginal farmland in the floodplain from willing sellers and reconnecting these lands to the river and restoring them to floodplain ecosystems.

XI. Use the Locks and Dams to Manage Water Levels for Environmental Purposes

The St. Paul, Rock Island and St. Louis Districts of the Corps of Engineers should lead interagency teams to design and implement projects to modify dam operations in some pools and modify flows in the open river to provide flood pulse and low flow conditions to mimic natural river hydrographs and promote ecological diversity.

XII. Open Side Channels and Manage Sediment Deposition

The St. Paul, Rock Island and St. Louis Districts should lead interagency teams to design and implement projects to open side channels and manage sediment deposition in side channels and backwaters.

XIII. Improve Channel Maintenance to Support Natural Resource Objectives

Each Corps of Engineer District, using its channel maintenance management planning processes, should seek, if necessary, additional authorization and then adequate funding to improve their dredging and channel maintenance programs so that they can be used for habitat restoration as well as channel maintenance.

Summary

In both policy and practice, the Administration, Congress, and the Corps of Engineers can all take steps to be better partners in management of the Mississippi River. You have asked for our thoughts and we have provided a response. We offer our services to continue to build upon the framework presented herein.